

# **EXHIBIT E**

1  
2 UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

3 -----X  
CHAD STANBRO,

4 PLAINTIFF,

5 - against -

Case No.:  
19-CV-10857

6  
7 WESTCHESTER COUNTY HEALTH CORPORATION,  
8 WESTCHESTER MEDICAL CENTER, FRANK WEBER,  
AND JOHN FULL,

9 DEFENDANTS.

10 -----X  
CHAD STANBRO,

11 PLAINTIFF,

12 - against -

Case No.:  
19-CV-10857

13 C.O. NADYA PALOU, C.O. RAYMOND DEAL, C.O.  
14 KRISTOPHER LEONARDO, C.O. RICHARD LANDRY,  
15 CORRECTION NURSE GARY PAGLIARO, AND  
CORRECTION SERGEANT ENRIQUE TORRES,

16 DEFENDANTS.

17 -----X

18 DATE: May 4, 2021

19 TIME: 11:00 A.M.

20  
21 DEPOSITION of the Defendant,  
STEPHEN URBANSKI, taken by the respective  
22 parties, pursuant to an Order and to the  
Federal Rules of Civil Procedure, held via  
23 videoconference, before Victoria Chumas, a  
Notary Public of the State of New York.

1 S. URBANSKI

2 again, I know it's that he was -- during a  
3 medical procedure he had to be restrained.  
4 I just don't recall specifically if the  
5 force used to restrain him was around his  
6 neck area or not.

7 Q. But did you hear from any  
8 source that any force was used against Mr.  
9 Stanbro's neck?

10 MS. COLLINS: Objection. You  
11 can answer.

12 A. Again, I don't specifically  
13 recall. I know that he suffered a neck  
14 injury, so I don't recall whether a staff  
15 member specifically said that they used  
16 force on his neck or not.

17 Q. Well, was it your understanding  
18 in any event that the neck injury was  
19 sustained as a result of the use of force  
20 by correction officers?

21 A. The neck injury was a result  
22 from a use of force by correction officers  
23 from what I'm told, but I am not medical  
24 staff.

25 Q. Now, when you received this

1 S. URBANSKI

2 complaint from someone at Westchester about  
3 what they thought was unnecessary force  
4 used against Mr. Stanbro, did you inquire  
5 further to ask for specifics? Like what  
6 was done? What do you think was  
7 unnecessary? What type of force was used?

8 A. It began a further  
9 investigation into what took place. I  
10 believe that day we contacted the Office of  
11 Special Investigations for the department  
12 because the injuries, once they became  
13 obvious, and then the complaint from  
14 Westchester Medical Center, we would have  
15 called the Office of Special Investigations  
16 and forwarded the issue to them because  
17 they are our investigating body for our  
18 department.

19 Q. Now, was it after you received  
20 this complaint from Westchester Medical  
21 Center that you decided to interview  
22 Officers Deal and Palou?

23 A. They were on the way back from  
24 the facility and the initial information I  
25 had was a little vague. And then, by the

1 S. URBANSKI

2 inmate was reporting that he could not feel  
3 his legs and Westchester Medical Center  
4 said he needed additional care, we would  
5 have erred on the side of caution and he  
6 would have received additional care.

7 Q. Okay. Were there any video or  
8 surveillance cameras posted outside of the  
9 RMU on August 31, 2018?

10 A. The RMU building has no camera  
11 system attached or associated with it.

12 Q. And was that the case also back  
13 in August of 2018?

14 A. Yes, sir.

15 Q. Okay. How about a video system  
16 whereby you could look at a monitor and see  
17 somebody entering the RMU?

18 A. I don't believe -- I am just  
19 trying to -- in the interior of the fence  
20 line there would be no cameras. There is  
21 one camera for an electronic gate there, so  
22 there should be a camera associated with  
23 the electronic gate, but it is not a  
24 recording camera.

25 Q. Okay. Now, did you come to

1 S. URBANSKI

2 learn that after Mr. Stanbro was returned  
3 to the RMU he was then brought by ambulance  
4 to an outside hospital?

5 A. Yes.

6 Q. And did you come to learn that  
7 this escort to the outside hospital was  
8 videotaped?

9 A. Yes. I ordered the  
10 videotaping.

11 Q. To whom did you give that  
12 order?

13 A. I would probably have given it  
14 to the watch commander, but specifically  
15 who I gave it to that day I don't recall.  
16 Sergeant Carreras was the supervisor sent  
17 on it and he was given the direction.  
18 Whether it came specifically for him or the  
19 watch commander, I don't recall.

20 Q. I'm sorry, what was Sergeant  
21 Carreras' role that day?

22 A. He was a supervisor that we  
23 sent on the trip.

24 Q. Why did you order that the  
25 escort from the RMU to the outside hospital

1 S. URBANSKI

2 be videotaped?

3 A. Well, we became aware of the  
4 significance of his injury. The hospital  
5 had sent information that they had  
6 questioned the need for the use of force,  
7 and at that time I felt it was appropriate  
8 to send a supervisor and a videocamera on  
9 the medical trip.

10 Q. And was it your understanding  
11 that that videotape was required to be  
12 preserved?

13 A. It should be, yes.

14 Q. Did you ever have any  
15 discussions with Sergeant Carreras  
16 regarding his observations of Mr. Stanbro?

17 A. Observations in regards to?

18 Q. Any observations he had of Mr.  
19 Stanbro.

20 A. Not that I specifically  
21 remember. I may have.

22 Q. Have you ever viewed the  
23 videotape of the escort from the RMU to the  
24 outside hospital?

25 A. I believe I did, yes.

1 S. URBANSKI

2 Q. How many times did you review  
3 that videotape?

4 A. I don't recall.

5 Q. Was it more than once?

6 A. Once, I would imagine.

7 Q. Give me just a general  
8 timeframe as to when you reviewed that  
9 videotape.

10 A. It would have been shortly  
11 after the incident, Probably the next day  
12 because he went to the hospital later that  
13 evening. I would have eventually left the  
14 facility, so the next day, the day after.

15 Q. What was your purpose of  
16 viewing that videotape?

17 A. It's part of my job.

18 Q. Do you view all or do you  
19 review all videotapes of escorts of  
20 prisoners to outside hospitals?

21 A. Myself or the -- no. Whenever  
22 there is an unusual incident or a use of  
23 force when a video is taken, either myself  
24 or my captains review the video.

25 Q. And did this tape also have

1 S. URBANSKI

2 audio?

3 A. It would have.

4 Q. Tell me what you recall seeing  
5 on the videotape.

6 A. I don't recall.

7 Q. Do you recall --

8 A. It would have been the inmate  
9 being brought to the van and into the van  
10 to the hospital, but the specific video, I  
11 don't recall it.

12 Q. Do you recall what Mr. Stanbro  
13 appeared like in the videotape?

14 A. The picture in the UI packet is  
15 more specific to what I remember. That he  
16 could not move his lower extremities. It  
17 looked like he was in a little bit of  
18 discomfort or in discomfort.

19 Q. What did you see or hear that  
20 lead you to believe that he was in  
21 discomfort?

22 A. Just the way he was acting.

23 Q. How was he acting?

24 A. Again, he was -- I don't know  
25 how to describe it. He appeared to be in

1 S. URBANSKI

2 discomfort.

3 Q. Was he crying?

4 A. I don't recall.

5 Q. Was he screaming out in pain?

6 A. Sir, I don't recall. I  
7 remember the pictures especially from the  
8 UI packet looked like he was in discomfort,  
9 but whether he was crying or screaming in  
10 pain, I don't recall.

11 Q. Now, when you say the pictures  
12 from the UI packet, are you referring to  
13 pictures of him in the Stryker chair?

14 A. Yes.

15 Q. I would like you to take a look  
16 at Exhibit 23, which consists of two pages  
17 and four photographs. Are those the  
18 photographs you just referred to?

19 A. Yes.

20 Q. And when you observed the  
21 videotape of Mr. Stanbro's escort from the  
22 RMU to the hospital, did he appear in the  
23 same condition that's depicted in these  
24 photographs?

25 A. He was obviously not in a

1 S. URBANSKI

2 Stryker chair, but he appeared similarly in  
3 discomfort.

4 Q. Now, you say his legs were not  
5 moving. Did you see his arms moving at any  
6 time in the videotape?

7 A. Sir, I reviewed the video  
8 almost three years ago. I don't remember  
9 the specifics of the video. Like I said  
10 previously, the photos of him in the  
11 Stryker chair are what stick in my memory  
12 the best.

13 Q. In the videotape, did Mr.  
14 Stanbro appear conscious to you?

15 MS. COLLINS: Objection. You  
16 can answer.

17 A. I don't recall if he was  
18 conscious the entire video or not.

19 Q. Do you recall if he was  
20 conscious at any point in the video?

21 MS. COLLINS: Objection. You  
22 can answer.

23 A. I believe he was.

24 Q. And what did you see or hear  
25 that led you to believe he was conscious